

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA.

Plaintiff,

V.

AMEREN MISSOURI.

Defendant.

Case No. 4:11-CV-00077-RWS

Judge Rodney W. Sippel

AMEREN MISSOURI'S MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Rule 13.05, and the Stipulated Protective Order Regarding Confidential Information and Documents (ECF # 90) entered by this Court, Ameren Missouri hereby moves to file under seal its brief and exhibits for its Motion to Compel Production of an EPA Presentation Regarding the Causation Requirement of the NSR Regulations (ECF # 330). The aforementioned filings describe or pertain to a document that EPA claims is protected and that EPA clawed back pursuant to the Protective Order in this case.

WHEREFORE, Defendant Ameren Missouri respectfully requests that the Court grant this motion and order the relief requested herein.

Dated: August 29, 2014

Respectfully submitted,

/s/ Matthew B. Mock

Ronald S. Safer

Patricia Brown Holmes

Renee Cipriano

Steven J. Bonebrake

Matthew B. Mock

Joshua R. More

(All admitted *pro hac vice*)

SCHIFF HARDIN LLP

233 South Wacker Drive, Suite 6600
Chicago, Illinois 60606
(312) 258-5500
Fax: (312) 258-5600

James J. Virtel
ARMSTRONG TEASDALE LLP
7700 Forsyth Boulevard Suite 1800
St. Louis, Missouri 63105
(314) 621-5070
Fax: (314) 612-2298
jvirtel@armstrongteasdale.com

Counsel for Defendant Ameren Missouri

CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2014, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will cause an electronic copy to be served on counsel of record, who are listed below:

Andrew C. Hanson
Bradford T. McLane
Nigel B. Cooney
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, DC 20044-7611
Telephone: (202) 305-0544
Facsimile: (202) 616-6584
andrew.hanson2@usdoj.gov
bradford.mclane@usdoj.gov
nigel.cooney@usdoj.gov

Suzanne J. Moore
Andrew J. Lay
United States Attorney's Office
Eastern District of Missouri
Thomas Eagleton U.S. Courthouse
111 South 10th Street, 20th Floor
St. Louis, MO 63102
Telephone: (314) 539-2547
Facsimile: (314) 539-2309
suzanne.moore@usdoj.gov
andrew.lay@usdoj.gov

/s/ Matthew B. Mock